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8
9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **SUSAN VASQUEZ DAVIS**
14 **a.k.a., SUSAN VASQUEZ-DAVIS**
a.k.a., SUSAN VASQUEZ-PEREZ
a.k.a., SUSAN VASQUEZ PEREZ
a.k.a., SUSAN BOSMA
15 **a.k.a., SUSAN D. BOSMA**
a.k.a., SUSAN PEREZ
16 **a.k.a., SUSAN V PEREZ**
a.k.a., SUSAN BOOMA
17 **a.k.a., SUSAN DOLORES READING**
a.k.a., SUSAN VASQUEZ
18 6340 Napa Ave.
Rancho Cucamonga, CA 91701

19 Registered Nurse License No. 403205
20 Public Health Nurse Certificate No. 71531

21 Respondent.

Case No. **2013-610**

A C C U S A T I O N

22 Complainant alleges:

23 **PARTIES**

24 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
25 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
26 Consumer Affairs.

27 2. On or about August 31, 1986, the Board of Registered Nursing (Board) issued
28 Registered Nurse License No. 403205 to Susan Vasquez Davis, also known as Susan Vasquez-

1 Perez, Susan Bosma, Susan D. Bosma, Susan Vasquez-Perez, Susan Vasquez Perez, Susan Perez,
2 Susan V Perez, Susan Booma, Susan Dolores Reading, Susan Vasquez (Respondent). The
3 Registered Nurse License was in full force and effect at all times relevant to the charges brought
4 herein and will expire on January 31, 2015, unless renewed.

5 3. On or about March 28, 2007, the Board issued Public Health Nurse Certificate No.
6 71531 to Susan Vasquez Davis, also known as Susan Vasquez-Perez, Susan Bosma, Susan D.
7 Bosma, Susan Vasquez-Perez, Susan Vasquez Perez, Susan Perez, Susan V Perez, Susan Booma,
8 Susan Dolores Reading, Susan Vasquez. The Registered Nurse License was in full force and
9 effect at all times relevant to the charges brought herein and will expire on January 31, 2015,
10 unless renewed.

11 **JURISDICTION**

12 4. This Accusation is brought before the Board under the authority of the following
13 laws. All section references are to the Business and Professions Code unless otherwise indicated.

14 **STATUTORY PROVISIONS**

15 5. Section 490 states, in pertinent part:

16 "(a) In addition to any other action that a board is permitted to take against a licensee, a
17 board may suspend or revoke a license on the ground that the licensee has been convicted of a
18 crime, if the crime is substantially related to the qualifications, functions, or duties of the business
19 or profession for which the license was issued.

20 "(b) Notwithstanding any other provision of law, a board may exercise any authority to
21 discipline a licensee for conviction of a crime that is independent of the authority granted under
22 subdivision (a) only if the crime is substantially related to the qualifications, functions, or duties
23 of the business or profession for which the licensee's license was issued.

24 "(c) A conviction within the meaning of this section means a plea or verdict of guilty or a
25 conviction following a plea of nolo contendere. Any action that a board is permitted to take
26 following the establishment of a conviction may be taken when the time for appeal has elapsed, or
27 the judgment of conviction has been affirmed on appeal, or when an order granting probation is
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1 made suspending the imposition of sentence, irrespective of a subsequent order under the
2 provisions of Section 1203.4 of the Penal Code.”

3 6. Section 2750 provides, in pertinent part, that the Board may discipline any licensee,
4 including a licensee holding a temporary or an inactive license, for any reason provided in Article
5 3 (commencing with section 2750) of the Nursing Practice Act.

6 7. Section 2761 states, in pertinent part:

7 "The board may take disciplinary action against a certified or licensed nurse or deny an
8 application for a certificate or license for any of the following:

9 "(a) Unprofessional conduct,

10 ...

11 "(d) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the
12 violating of, or conspiring to violate any provision or term of this chapter [the Nursing Practice
13 Act] or regulations adopted pursuant to it.

14 ...

15 "(f) Conviction of a felony or of any offense substantially related to the qualifications,
16 functions, and duties of a registered nurse, in which event the record of the conviction shall be
17 conclusive evidence thereof.”

18 8. Section 2764 provides, in pertinent part, that the expiration of a license shall not
19 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or
20 to render a decision imposing discipline on the license.

21 REGULATORY PROVISIONS

22 9. California Code of Regulations, title 16, section 1444 states, in pertinent part:

23 "A conviction or act shall be considered to be substantially related to the qualifications,
24 functions or duties of a registered nurse if to a substantial degree it evidences the present or
25 potential unfitness of a registered nurse to practice in a manner consistent with the public health,
26 safety, or welfare.”

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unprofessional conduct. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraph 11(b), as though set forth fully.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board issue a decision:

1. Revoking or suspending Registered Nurse License No. 403205, issued to Susan Vasquez Davis, also known as Susan Vasquez-Perez, Susan Bosma, Susan D. Bosma, Susan Vasquez-Perez, Susan Vasquez Perez, Susan Perez, Susan V Perez, Susan Booma, Susan Dolores Reading, Susan Vasquez;

2. Revoking or suspending Public Health Nurse Certificate No. 71531, issued to Susan Vasquez Davis, also known as Susan Vasquez-Perez, Susan Bosma, Susan D. Bosma, Susan Vasquez-Perez, Susan Vasquez Perez, Susan Perez, Susan V Perez, Susan Booma, Susan Dolores Reading, Susan Vasquez;

3. Ordering Susan Vasquez Davis to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and

4. Taking such other and further action as deemed necessary and proper.

DATED: February 12, 2013

Stacie Bern
fn LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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